

Message

From: Brandy Brooks [brandy.brooks@tceq.texas.gov]
Sent: 3/20/2019 6:54:53 PM
To: Crossland, Ronnie [Crossland.Ronnie@epa.gov]
CC: Richard Chism [Richard.Chism@tceq.texas.gov]; Kelly Cook [kelly.cook@tceq.texas.gov]; Ramiro Garcia [ramiro.garcia@tceq.texas.gov]; Tracy Miller [tracy.miller@tceq.texas.gov]; Susan Johnson [susan.johnson@tceq.texas.gov]
Subject: Air Monitoring Questions

Hello Ronnie,

Please see our responses to your questions below.

Brandy Brooks, Assistant Director
TCEQ Monitoring Division

Sent from my iPhone

From: Crossland, Ronnie <Crossland.Ronnie@epa.gov>
Sent: Wednesday, March 20, 2019 10:54 AM
To: Kelly Cook <kelly.cook@tceq.texas.gov>
Cc: Smith, Monica <smith.monica@epa.gov>
Subject: Air Monitoring Questions

This is what went out:

Texas Air Monitor (Information provided by TCEQ)

The TCEQ ambient monitoring station at Houston Deer Park (CAMS 35) experienced operational issues with the AutoGC sampler, indicated by quality control failures on March 11. Therefore, data were invalidated back to the previous passing daily QC check which was March 10. Only the AutoGC was affected; other samplers at this monitoring station continued to operate normally.

The TCEQ contractor performed the repair March 13-16. Following this repair, the contractor must run a 1-point QC check, followed by a multi-point check typically completed within a few days. The instrument passed the 1-point QC check at 8:00 am on Saturday, March 16. The instrument resumed ambient data collection at 11:00 am on Saturday, March 16, the day before the fire. The instrument continued to collect ambient data throughout the day on Sunday, March 17 and into Monday, March 18 until 5:00 am. The contractor began the multi-point check at 6:00 am on Monday, March 18, this QC check is required in the days following a repair. The multi-point check was completed and ambient data collection has resumed as of 1:00 pm, Monday, March 18. The ambient data collected from Saturday, March 16 through early Monday, March 18 have undergone preliminary review and are within required

quality standards. The valid ambient AutoGC data collection resumed at 1:00 pm CST and data appears ambient and consistent with normal trends.

These are the associated questions:

Air Monitoring – you mentioned that the QC check on Monday was “required in the days following a repair” – is that a requirement of the repair contract or another instrument? Was the check required to be that day at that time?

It is an operational requirement per TCEQ AutoGC Standard Operating Procedure to perform a multipoint calibration as quickly as possible when the system has stabilized after major maintenance. Monday morning was the first opportunity for the contractor to perform the multipoint calibration curve, although it was not required to be done on Monday. The TCEQ was not aware that the contractor would be performing the multipoint check on Monday, although the contractor is not required to notify the TCEQ beforehand. However, if the contractor had waited to perform the check at a later date and the results had not met acceptance criteria, there would have been an increased risk of needing to invalidate samples that had been collected prior to the multipoint check.

Was a backup monitor deployed before the monitor was taken offline, given the ongoing air release event?

The monitor was never actually taken offline. A backup monitor was not deployed. If a backup monitor had been deployed, the necessary calibration and setup of the backup instrument would have taken longer than the multipoint QC check. Therefore, it still would not have provided data during the 6:00 am to noon timeframe.

Are monitors being deployed southwest of the site?

TCEQ has personnel on-site conducting air assessments throughout the area.